

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Case No: 1:19-cv-04715-NRB

LINDSEY ADELMAN STUDIO, LLC, a
New York limited liability company, LINDSEY
ADELMAN, individually,

Plaintiff,

vs.

ZORA Lighting Co., Ltd., a Chinese
business entity; Liang Tang, individually,
and John Does Nos. 1 - 5,

Defendants. /

SUPPLEMENTAL DECLARATION OF KEVIN MARKOW

Kevin Markow does hereby declare pursuant to 28 U.S.C. § 1746:

1. I submit this supplemental declaration in support of Plaintiff's Ex-Parte Motion for Temporary Restraining Order and Order to Show Cause Why a Preliminary Injunction Should Not Issue (the "Motion") (Dkt. 5). This supplements my previously filed Declaration in this matter (Dkts. 5-2 and 11) and is based upon my personal knowledge as well as research I conducted.

2. I have personally conducted and supervised research into the payment processing companies utilized by the Zora website and have determined that Zora purports to utilize six payment processing options. Five of the six payment processing options appear to be affiliated with a company Payssion, a global payment processing company whose homepage (www.payssion.com) describes the company as a "[o]ne stop solution for global payment processing" with "[o]ne API for 200+ local payment methods worldwide."

3. The six payment processing options listed on the Zora website are SOFORT, European Bank Transfer, Union Pay, Webpaycl, Alipay, and DH Pay. All but DH Pay are affiliated with Payssion. The physical address that my Firm has found for Payssion is the following:

Payssion Limited
Reg. # 1851413
No. 72-74 Wing Lok Street
Sheungwan, Hong Kong

4. Of the six processing companies, none appear to have a genuine physical presence in the United States.

5. My Firm's research has revealed that SOFORT is a German company located in Gauting, Germany. Public information shows it was acquired by Klarna, a Swedish company. Klarna Bank AB is its legal name, which is the holding company for the Klarna Group. The registered office for the company is:

Klarna Bank AB
Corp. Reg. No. 556737-0431
Seavagen 467, SE-111
36 Stockholm, Sweden

6. My Firm's research has revealed that the European Bank Transfer option on the Zora website is a bank transfer option that is available through Payssion.

7. My Firm's research has revealed that Union Pay is located in Shanghai, The Peoples Republic of China. Its registered address is:

Floor 2-7, No. 6
Dangfang Road
Pudong New District,
Shanghai, PRC

8. My Firm's research has revealed that Webpaycl is an entity owned by Transbank, SA which is located in Santiago Chile. It's office is located at the following address:

Matriz House, Orphans 770
Piso 10
Santiago, Chile
www.transbank.ck

9. My Firm's research has revealed that Alipay is owned and operated by ANT Financial out of Hangzhou, China. They have a United States address listed on their website at the following location:

Mark Bachman
2150 S. College
Santa Maria, CA 93455

However, a search of this address through Google Maps reveals that this is the address for a Volkswagen and BMW car dealership.

10. My Firm's research has revealed that DH pay is owned and operated by DHGate.com, a Chinese wholesale platform which is an online marketplace with hundreds of sellers. It's owned by Dunhuang Holdings Limited, a Hong Kong Company. We were unable to locate an address for this company.

11. Upon further research and consultation with informational technology professionals whom our law firm employs, does business with, and relies upon, it appears any effort to expressly target the Lindsey Adelman pages and images on Defendants' website exclusively, leaving the rest intact, with registrars, web hosts or third-party servicers of the website is not technologically feasible.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Dated: May 28, 2019



Kevin Markow

ACTIVE: 12384226_1